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Little Rock

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## Arkansas Game and Fish Commission

**Jeff Crow**  
Director

**Joe Morgan**  
Little Rock

**Bobby Martin**  
Rogers

**Stan Jones**  
Walnut Ridge

**Steven Beaupre, Ph.D., Ex-Officio**  
University of Arkansas  
Fayetteville

July 12, 2017

Senator Ronald Caldwell, Chair  
Senate Committee on Agriculture Forestry and Economic Development

Re: Kaput® Feral Hog Bait

Dear Senator Caldwell:

The Arkansas Game and Fish Commission fully recognizes the detrimental ecological and economic impacts of feral swine to the State of Arkansas, and we fully support, in theory, the use of a toxicant to aid in the control and eradication of this invasive species. However, we do not believe that the Kaput® product, with an active ingredient of warfarin, meets the criteria of a suitable toxicant to address this issue. Warfarin works by altering the metabolism of vitamin K to prevent the activation of blood clotting factors resulting in death through blood loss. The presence of active clotting factors in the blood at the time of consumption means that there is a long delay from exposure to the time of effect and ultimately death. Many of our agency's concerns arise from the duration of this process.

Our first concern is the potential for direct exposure of wildlife species to the product resulting in mortality of public trust resources. In an effort to prevent this, the product label contains specific requirements for the use of this bait in stations with weighted lids. However, work by the Louisiana Department of Wildlife and Fisheries and others demonstrates that weighted lids do not hinder access by American black bears and likely other wildlife species. Additionally, the complicated nature of the label instructions make the inappropriate use of this product by some individuals virtually inevitable, increasing the potential for wildlife exposure. Furthermore, sublethal effects, including reproductive failure, in wildlife with low dose exposure have not been investigated.

Our second concern is the indirect exposure of wildlife and domestic animals to warfarin through the scavenging of carcasses containing this toxin. Again, the label instructions recognize this concern by requiring individuals using Kaput® to search for and bury poisoned swine. However, the long duration to effect makes it unlikely that carcasses will be consistently removed from the landscape. Secondary toxicosis in birds of prey following the use of warfarin as a rodent poison have been previously documented. The long duration to effect of this product also hinders our agency's ability to monitor for, quantify, or respond to the adverse effects of warfarin exposure in our native wildlife.

The third concern we would like to present is one of public safety, both real and perceived. Feral swine are a common food source for many residents in the State of Arkansas. The Kaput product is laced with a blue dye intended to mark carcasses that have had warfarin exposure. However, this dye may not become apparent until 24 or more hours after an animal has consumed the toxin, allowing a window where human exposure is possible. Additionally, we are concerned that low-dose exposure of game species to this product could result in

carcass marking without lethal effects leading to undesirable waste of harvested game and strong dissatisfaction in our hunting community.

The concerns we have presented today are shared by many in the wildlife management community. Letters have been sent to the EPA from the Association of Fish and Wildlife Agencies and the National Environmental Coalition on Invasive Species requesting the suspension or cancellation of the federal registration for this product until further research and evaluation have been completed. The Arkansas Game and Fish Commission has requested that the Arkansas State Plant Board consider restricted licensure of this product in our state if it is to be licensed at all. Experience with invasive species teaches us that there are no magic bullets for these difficult situations, but the recent formation of the Arkansas Feral Swine Task Force is a positive step in this fight. The Game and Fish Commission looks forward to participating in that group and to the comprehensive recommendations this it will provide later this year.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Crow", with a long horizontal flourish extending to the right.

Jeff Crow  
Director

***Kaput***<sup>®</sup>

# FERAL HOG BAIT



**NET WT. 25 LBS (11.34 KG)**

**ACTIVE INGREDIENT:**

Warfarin (CAS Number 81-81-2) .....0.005%

**OTHER INGREDIENTS** .....99.995%

**TOTAL** .....100.000%

EPA Reg. No. 72500-26

EPA Est. 72500-CO-1

**Keep Out of Reach of Children**

**CAUTION**

See back panel for First Aid and Precautionary Statements.



## FIRST AID

### If Swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

### If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

## TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian at once.

## NOTE TO PHYSICIAN OR VETERINARIAN

Contains Warfarin, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K1, intramuscularly or orally.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed. Keep away from humans, domestic animals and pets. Any person who retrieves carcasses or unused bait following application of this product must wear protective gloves.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

### Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks, and
- When handling bait or retrieving animal carcasses, chemical-resistant gloves made of barrier laminate, polyethylene, butyl rubber (>14 mils), nitrile rubber (>14 mils), neoprene rubber (>14 mils), natural rubber (>14 mils), polyvinyl chloride (>14 mils), or Viton (>14 mils).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

## USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

## ENVIRONMENTAL HAZARDS

This product may be toxic to fish, birds and other wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten the bait. Do not apply this product directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### READ THIS LABEL:

Read this entire label and follow all use directions and use precautions.

**IMPORTANT:** Do not expose children, pets, domesticated animals or other non-target wildlife to this product. To help prevent accidents:

1. Store product not in use in locations out of reach of children, pets, domesticated animals and wildlife.
2. Apply this product only as specified on this label.
3. Dispose of product container as well as unused, spoiled or recoverable unconsumed bait as specified on this label.

**USE RESTRICTIONS:** This product may only be used to control feral hogs (*Sus scrofa*) on pastures, rangeland, forests, non-crop areas, and crop lands. This bait may only be applied in hog feeders equipped with heavy lids (minimum of 8 – 10 lbs. of total weight) on bait compartments so as to limit direct access to bait by nontarget animals. Feral hogs must be conditioned to accept feed from the bait dispensers and to open the weighted lids to bait compartments.

- Do not apply this bait directly on the ground, including all types of ground surface (e.g., bare or plant-covered ground, paved surfaces, etc.). Apply this product only in hog feeders consistent with the description provided above.
- Apply bait in fenced areas, if available.
- When handling bait or animal carcasses, wear protective gloves made of barrier laminate, polyethylene, butyl rubber (>14 mils), nitrile rubber (>14 mils), neoprene rubber (>14 mils), natural rubber (>14 mils), polyvinyl chloride (>14 mils), or Viton (>14 mils).
- Store this product out of reach of children, pets, domesticated animals, and wildlife.
- Post bilingual caution signs (English and Spanish) in the treated areas to warn the public of the presence of the Warfarin bait and to forbid disturbance of bait dispensers and hog carcasses. Post these signs on public roads, trails, and pathways within and at common points of access to treated areas.

**GRAZING RESTRICTIONS:** Do not allow livestock to graze on baited areas (whether fenced or open) during the baiting program. If bait is to be applied in areas used for grazing, ensure that all livestock are removed and excluded from baited areas before applying this product and for at least 90 days after toxic baits are removed from bait dispensers.

**SELECTION OF BAITING SITES:** Baiting sites must be consistent with the limitations set forth in the **USE RESTRICTIONS** on this label (above). Before applying this product, observe the area selected for treatment to identify where hog activity and trails are located. Look for evidence of recent activity, including hog sightings, hog damage to crops, rooting of the soil, hog wallows, and fresh hog tracks and fecal material.

**PLACING AND SECURING HOG FEEDERS:** Locate hog feeders in or near probable resting areas for hogs, including brush along streams, dense cover, and tall vegetation. Do not place feeders in open areas in crops, fields, or pastures. From one to three bait feeders may be used per placement location, according to the apparent number of hogs visiting the location. Three dispensers spaced no more than 10 feet apart may be used where hog numbers are excessive (e.g., if large hog family groups, or sounders, are present). Secure feeders in place, so that hogs cannot tip them over, by use of T-posts or by tying the feeders to trees or shrubs.

**CONDITIONING HOGS TO FEEDERS:** After the feeders are situated and secured, feral hogs must be conditioned (trained) to feed from them. To accomplish this, load the feeding compartments with a non-toxic feed, and open the lids to the feeding compartments by about 6 inches so that hogs can access this feed with little difficulty. To condition hogs to accept this product, use one of the following preparations as the non-toxic feed: (1) cracked or whole corn, soaked in water for 3-5 days until it has a noticeable odor; (2) cracked or whole corn treated with a commercially available hog attractant which includes scents of hog urine, fruit, or pet food; or (3) Kaput Feral Hog Lure. Load 25 to 50 lbs. of the non-toxic feed into each hog feeder. Provide access to non-toxic feed for three to six weeks, until hogs are feeding readily from the bait compartments. Failure to condition hogs to feeders or ending the conditioning period too early may reduce the number of hogs taken or prolong the period of time needed for toxic baiting.

**BAIT APPLICATION:** After feral hogs have been conditioned to take non-toxic feed from bait compartments, remove all of the non-toxic feed remaining in the feeders. Add 25 to 50 lbs. of Kaput® FERAL HOG BAIT to

each feeder and **close lids to bait compartments** so that hogs must lift the doors with their snouts in order to access bait. (Do not load this product into feeders from which no non-toxic bait was consumed during the conditioning period.) Monitor feeders every 1 to 4 days once treatment has begun to determine whether hogs are accessing bait, to assess whether bait is being spilled around feeders, and to replenish bait, if appropriate. Refill feeders if bait is significantly depleted or degraded, and there still is evidence of hog activity at the feeder. As bait take and hog numbers decline, the feeders may be monitored at 5-day intervals, but site surveillance must continue as described below. If possible, feeders should be checked at mid-day to minimize disturbance to feral hogs. Bait spilled around feeders must be collected and disposed of properly.

**SURVEILLANCE AND FOLLOW-UP:** Dead hogs may begin to appear in or near the treatment areas within 4 to 7 days after bait placement. Applicators must return to the treatment site within 4 days after the first bait placements were made, and at 2- to 4-day intervals thereafter, to inspect the site for evidence of dead or dying feral hogs and/or dead nontarget animals. All carcasses found must be disposed of properly. Carcasses may be buried on site in holes dug deeply enough that the entire carcass is at least 18 inches below the ground surface. Cover buried carcasses up to the level of the surrounding ground. If burial is not practical (e.g., due to frozen or extremely hard ground) and other disposal methods are allowed by State and local authorities, carcasses may be disposed of by other methods to ensure that carcasses are not accessible to scavengers. Continue to monitor the treatment area to collect and dispose of feral hogs and to search for non-target animals for at least two weeks after the removal of all bait from the hog feeders. Deaths of any animals other than feral hogs that appear to be the result of baiting with this product must be reported to State authorities.

**Note:** A dye in this product will impart a blue color to the fatty tissues of hogs that have eaten the bait.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. Offer container for recycling, if available, or reconditioning, if appropriate. Otherwise, dispose of empty container in a sanitary landfill.

Lot Number: [See Container Lid](#)

## WARRANTY

To the extent consistent with applicable law, Manufacturer and Seller make no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use/handling is contrary to label instructions.

Patent Pending  
Made in USA

**Scimetrics**  
LTD. CORP.

**Pest Management Solutions**

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(970) 482-1330  
customerservice@kaputproducts.com

Label Version 3/13/2017



# National Environmental Coalition on Invasive Species

Center for Invasive Species Prevention ♦ National Wildlife Federation ♦ The Wildlife Society ♦  
American Bird Conservancy  
[www.necis.net](http://www.necis.net)

2 June 2017

Administrator Scott Pruitt  
USEPA William Jefferson Clinton Building  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20004

Dear Administrator Pruitt,

The above-listed member organizations of the National Environmental Coalition on Invasive Species (NECIS) are writing to you today to urge the EPA to **immediately suspend or cancel the registration of Kaput® Feral Hog Bait**.

As NECIS member organizations, we are focused on promoting scientifically sound policies that prevent the introduction and spread of invasive species in the United States. Our organizations recognize that feral hogs are a nuisance invasive species throughout much of the US and require collaborative and aggressive approaches to management. However, the fast-tracked registration of Kaput® Feral Hog Bait by the previous Administration has resulted in continued concern being raised over whether the impacts of this pesticide to non-target wildlife and public health were properly evaluated.

As stated in a May 5 [letter](#) sent to the EPA by the Association of Fish and Wildlife Agencies, native wildlife can be exposed to Kaput® via multiple pathways and can result in lethal or sub-lethal impacts. The required use of 8-10 pound feeder lids as stated on EPA-approved label instructions will likely not deter non-target carnivores such as black bears from directly consuming bait. The label instructions also require spilled bait around feeders be removed from the area only every one to four days, placing a broad array of wildlife populations at risk for exposure.

Label instructions additionally state that all effectively targeted feral hogs need to be properly disposed of after death. However, it can take up to two weeks for death to occur in feral hogs after bait consumption, allowing for a wide dispersal of deceased poisoned hogs. Scavenging wildlife could then consume lethal or sub-lethal doses of Kaput® from carcasses that are not detected or properly disposed of by Kaput® users.

This wildlife issue can quickly transform into a human health concern if game species that consume sub-lethal doses are then harvested by hunters. It can also be a problem in feral hog populations that are utilized as a human meat source. According to the Kaput® Products website, the dye within the bait that turns feral hog fatty tissue blue does not take effect until 24 hours after consumption. This provides a window in which a hunter may harvest a poisoned hog prior to the hog's tissues being stained.

The potential wildlife and human health impacts of Kaput® Feral Hog Bait stress the need to gather more information in order to properly reevaluate this pesticide. We echo the request of the Association of Fish and Wildlife Agencies to "suspend or cancel the registration of this product until such a time that formal consultation can be completed with the United States Fish and Wildlife Service, the United States Department of Agriculture, and the Food and Drug Administration."

Thank you for your consideration of the above request. The undersigned NECIS member organizations stand ready to work with you to address the critical challenges associated with invasive species management.

Sincerely,

Center for Invasive Species Prevention  
Peter T. Jenkins, President  
301-500-4383, jenkinsbiopolicy@gmail.com

National Wildlife Federation  
Bruce A. Stein, PhD, Associate Vice President, Conservation Science & Climate Adaptation  
202-797-6602, steinb@nwf.org

The Wildlife Society  
Bruce Thompson, PhD, CWB®, President  
301-897-9770, cmurphy@wildlife.org

American Bird Conservancy  
Grant Sizemore, Director of Invasive Species Programs  
202-888-7480, gsizemore@abcbirds.org

CC: Rick Keigwin, Jr., Acting Director, EPA Office of Pesticide Programs  
Venus Eagle, Acting Chief, Invertebrate-Vertebrate Branch 3, Registration Division of EPA  
Office of Pesticide Programs  
Jim Kurth, Acting Director, USFWS  
Kevin Shea, Administrator, USDA-Animal and Plant Health Inspection Service  
Stephen Ostroff, M.D., Deputy Commissioner for Foods and Veterinary Medicine, Food and  
Drug Administration



The voice of fish and wildlife agencies

1100 First Street, NE, Suite 825  
Washington, DC 20002  
Phone: 202-838-3474  
Fax: 202-350-9869  
Email: [info@fishwildlife.org](mailto:info@fishwildlife.org)

May 5, 2017

Mr. Scott Pruitt, Administrator  
U.S. EPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

Subject: Notice of Pesticide Registration ([EPA Reg. No. 72500-26](#)) for Kaput® Feral Hog Bait

Dear Mr. Pruitt:

Founded in 1902, the Association of Fish & Wildlife Agencies (Association) represents North America's fish and wildlife agencies and serves to advance science-based management and conservation of species and their habitats for the public's long-term benefit and use. The Association has recently become aware of the registration of Kaput® Feral Hog Bait, and it has been brought to our attention that several states have expressed concerns about the environmental and public safety of this pesticide product.

We understand this regulatory decision was made under the previous Administration. However, given the above concerns, the Association requests the Environmental Protection Agency suspend or cancel the registration until such time that formal consultation can be completed with the United States Fish and Wildlife Service (USFWS), the United States Department of Agriculture (USDA), and the Food and Drug Administration. Also it would be helpful, as we work with you on this issue further, to review information that was utilized by EPA to evaluate Kaput® Feral Hog Bait relative to efficacy, non target impacts, and potential impacts to human health. In this regard, please provide a copy of any study or report or other information and associated evaluation conclusions used during the registration process.

The damage and disease impacts from feral hogs are well known and their control is a priority for many state fish and wildlife agencies. However, there are serious concerns regarding the environmental effects from the use of Kaput® Feral Hog Bait on the landscape as a means of eliminating feral hogs. The potential impacts include short- and long-term effects on non-target wildlife species either through consumption of the bait, or through consumption of carcasses that have been poisoned by the bait. These risks include the primary intoxication of small mammals and non-target game animals as well as secondary intoxication of raptors, including bald eagles and other species. In addition to direct mortality, questions remain about the impacts on fetal development in non-target species that receive sub-lethal doses.



Of specific concern are potential detrimental impacts to black bears, including the Louisiana black bear, which was removed from the Federal list of Endangered Species in the spring of 2016. Kaput® Feral Hog Bait, used according to label instructions to kill hogs, is likely to result in death or sub-lethal impacts to non-target black bear. Use of this product has the potential to create a new and increasing threat that could undermine the recovery of the Louisiana black bear and the management of other species, causing significant concern to state fish and wildlife agencies. We also have concerns that there could be impacts to some of the species identified in State Wildlife Action Plans as Species in Greatest Need of Conservation.

As mentioned above, there are concerns about the use of Kaput® Feral Hog Bait and the potential adverse impacts to wildlife resources. The registration of this product raises questions about the process used by the previous Administration, to approve the use of Kaput®. We are hopeful this issue could provide opportunity to review and improve this process. For example, it isn't clear if the registration process included sufficient consultation with the USFWS for potential impacts of the bait to federal trust wildlife species or if there was sufficient consultation with the USDA Animal Plant Health Inspection Service-Wildlife Services. In fact, USDA is currently working with the states on developing potential toxicants for feral hogs that are both efficient and have minimal impacts to non-target wildlife. Finally, we believe there needs to be further consideration regarding potential effects on human health associated with using this product for feral hogs. There are concerns that the pesticide may have health impacts to people, as it is labeled for use for animals that enter the food chain when harvested and consumed.

We appreciate your consideration of these concerns and respectfully request the opportunity to work with you and your team to reconsider registration of this product. I would be glad to discuss this issue further with you or your staff, so please don't hesitate to contact me at (850) 251-2162 if you have questions. We look forward your response on this important matter. Thank you.

Sincerely,



Nick Wiley, President  
Association of Fish and Wildlife Agencies

Cc: Venus Eagle, Acting Chief, USEPA, Invertebrate-Vertebrate Branch 3, Registration  
Division of Office of Pesticide Programs  
Jim Kurth, Acting Director, USFWS  
Kevin Shea, Administrator, USDA-Animal and Plant Health Inspection Services  
Stephen Ostroff, M.D., Deputy Commissioner for Foods and Veterinary Medicine, Food  
and Drug Administration





Alvin A. Taylor, President  
Southeastern Association of Fish and Wildlife Agencies  
c/o South Carolina Department of Natural Resources  
PO Box 167  
Columbia, SC 29202  
803-734-4007  
Email: [taylor@dnr.sc.gov](mailto:taylor@dnr.sc.gov)  
<http://www.seafwa.org>

April 24, 2017

Venus Eagle, Acting Chief  
United States Environmental Protection Agency  
Invertebrate-Vertebrate Branch 3, Registration Division  
Office of Pesticide Program  
Registration Division (750P)  
12 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

Dear Ms. Eagle:

This letter is in response to the Notice of Pesticide Registration (EPA Reg. No. 72500-26) for Kaput® Feral Hog Bait (Kaput®). The Southeastern Association of Fish and Wildlife Agencies (SEAFWA) is the professional association that serves as the collective voice of state fish and wildlife agencies, which possess the constitutional and/or statutory authority and responsibility for the conservation of fish and wildlife species within their borders, within the southeastern United States. SEAFWA member states include: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, Missouri, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, Virginia, and West Virginia.

SEAFWA recognizes the environmental and economic damage feral hogs inflict upon natural habitats, wildlife, and agricultural producers. Accordingly, SEAFWA strongly supports efforts to control feral hog populations, in order to reduce the damage feral hogs cause to wildlife, the environment and agricultural producers, and minimize public health risks. However, we have serious concerns regarding the environmental, public safety, and registration process of the Kaput® Feral Hog pesticide product. SEAFWA believes the use of this pesticide across the

landscape could potentially cause adverse effects on our wildlife resources and the health of citizens who may consume certain species. As such, SEAFWA requests that the EPA suspend or cancel this registration until such time that formal consultation can be completed with the USFWS and the Food and Drug Administration, and further information is available to address the remaining uncertainties concerning the potential detrimental effects of this toxicant.

Within SEAFWA, the use of this product according to label instructions represents a new risk to threatened, endangered or at-risk species. For example, the Louisiana black bear (Black Bear) is being managed under a Post-Delisting Monitoring Plan (Plan) approved by the US Fish and Wildlife Service (USFWS) prior to delisting this species in 2016. The purpose of the plan is to ensure management of the population of the Black Bear continues to sustain recovery status within its historic home range. The Plan requires the identification of any new or increasing threats that could undermine the continued existence of the Black Bear. Bear experts indicate that bears are susceptible to direct and secondary toxicity from this product when used according to label instructions, which could lead to the death of an undetermined number of bears. This product represents a new threat to the persistence of the Louisiana black bear. The Florida panther is another endangered species that is highly susceptible to warfarin toxicity, especially through the consumption of prey or scavenging of carcasses (e.g., feral hogs). Therefore, Kaput® represents an increased mortality risk to the Florida Panther population and is a serious concern.

Additionally, SEAFWA has concerns regarding primary intoxication of small rodents and game species as well as secondary intoxication of predatory and scavenging species such as migratory birds (e.g., vultures and raptors including bald eagles), black bears and other mammals such as bobcat, coyote, fox, opossum, raccoon and skunk. Very little information pertinent to research regarding exposure and toxicity to other wildlife has been put forth in regards to this product.

There also may be concerns related to public health through the human consumption of wildlife exposed to this pesticide. The Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), identifies "human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act" as an "unreasonable adverse effects on the environment." As a result of consuming the expected spillage, the toxicant (i.e., warfarin) may occur in species that are directly consumed as food by the public. Animals exposed to Kaput® as per label instructions may take days to die – a situation that enables them to roam miles away from the bait site before being captured or harvested by hunters. Across the Southeast, feral hogs are captured alive and sold to slaughter facilities for resale to restaurants, in addition to being hunted and consumed across the Southeast. Additionally, these species are highly attracted to corn (the recommended bait under the product label), susceptible to exposure to toxicant and commonly consumed by the public in the Southeast: raccoons, white-tailed deer, turkeys and black bears. Many of these species are donated to non-profit organizations that distribute wild game meat for consumption or are donated to friends and families of the hunters who harvested the game species. The short and long-term effects of the bait on human health are unknown.

Venus Eagle, Acting Chief  
United States Environmental Protection Agency  
April 24, 2017  
Page 3

Finally, SEAFWA has concerns regarding the process for registration of this product. The USFWS procedural review was not conducted; however, due to the significant changes to approved dosages and locations now approved for usage, a USFWS procedural review is warranted and should have been conducted. This review would have helped address concerns regarding potential impacts to human safety and non-target wildlife species. In the registration process for Kaput<sup>®</sup>, the USFWS was not consulted and no biological opinion was provided during and after the registration process for Kaput<sup>®</sup>.

The Endangered Species Act states that as part of the consultation process for pesticide products the "USFWS, along with EPA, NOAA-Fisheries, and the U.S. Department of Agriculture, is committed to providing product registrants, product users, and other interested parties opportunities for involvement. The agencies will provide notifications regarding how such involvement will be sought as the consultations unfold." However, interested parties, including state wildlife agencies, were not afforded opportunities for involvement.

We hope you find this input valuable and that EPA reconsiders the registration of Kaput<sup>®</sup> Feral Hog Bait.

Respectfully,



Alvin A. Taylor

cc: Ji Templeton, President, Southern Association of the State Departments of Agriculture  
Ron Regan, Executive Director, Association of Fish & Wildlife Agencies  
John Bowers, Chairman, SEAFWA Wildlife Resources Committee  
Curtis Hopkins, Executive Secretary, Southeastern Assoc. of Fish & Wildlife Agencies





Gary W.  
Black  
Commissioner

# Georgia Department of Agriculture

19 Martin Luther King Jr Dr SW • Atlanta, Georgia 30334-4201

April 21, 2017

Sue Valentine, Regulatory Manager  
Scimetrics Ltd. Corporation  
P.O. Box 1045  
Wellington, CO 80549

RE: Kaput® Feral Hog Bait, EPA Reg. #72500-26

Dear Ms. Valentine:

Pursuant to the authority under the Georgia Pesticide Control Act you are hereby notified that we are denying the registration of Kaput® Feral Hog Bait, EPA Reg. # 72500-26 in Georgia.

The Act states in part:

O.C.G.A., 2-7-59

*(e) If the Commissioner determines that a federally registered pesticide, with respect to the use of such pesticide within this state, does not warrant the proposed claims for it or would cause unreasonable adverse effects on the environment, he may refuse to register the pesticide as required in Code Section 2-7-55...*

We have made the decision not to register this product after consultation with the Georgia Department of Natural Resources, Fish and Wildlife Division and the Georgia Department of Agriculture's State Veterinarian. It is our conclusion that, even when the applicator follows all label directions, secondary exposure to non-target species is likely to occur. Additionally, the safeguards to protect contaminated meat from entering the human food chain are not sufficient.

We will re-consider this decision for the 2018 registration period beginning January 1, 2018 under the condition that Scimetrics is able to provide sufficient use data showing the product can be used safely and effectively with little or no harm to non-target species.

If you need any additional information regarding this matter please feel free to contact our office.

Regards,

Tommy Gray, Director  
Plant Industry  
Georgia Department of Agriculture



LOUISIANA DEPARTMENT OF AGRICULTURE & FORESTRY  
MIKE STRAIN DVM  
COMMISSIONER



April 18, 2017

**Agricultural &  
Environmental  
Sciences**  
Suite 3000  
(225) 925-3770  
Fax: 925-3760

**Agro-Consumer  
Services**  
Suite 5000  
(225) 922-1341  
Fax: 923-4877

**Animal Health  
& Food Safety**  
Suite 4000  
(225) 925-3962  
Fax: 925-4103

**Forestry**  
Suite 6000  
(225) 925-4500  
Fax: 922-1356

**Management  
& Finance**  
Suite 1000  
(225) 922-1255  
Fax: 925-6012

**Soil & Water  
Conservation**  
Suite 7000  
(225) 922-1269  
Fax: 922-2577

Sue Valentine, Regulatory Manager  
Scimetrics Ltd. Corp.  
PO Box 1045  
Wellington, CO 80549

RE: Kaput® Feral Hog Bait (EPA Reg. No. 72500-26) Registration Cancellation

Dear Ms. Valentine:

The Louisiana Department of Agriculture and Forestry (LDAF) received a section 3 state pesticide registration application for Kaput® Feral Hog Bait (EPA Reg. No. 72500-26), and the section 3 label was registered in February 2017 with the following restrictions: the classification of the product as a state restricted use pesticide (RUP) and the requirements for a pesticide stewardship training for the person(s) selling, purchasing and applying the product. The state RUP classification and the pesticide stewardship training requirements were implemented through a Section 24(c) registration (SLN No. LA17-0006).

The LDAF has a major concern regarding the registration of the Kaput Feral Hog Bait pertaining to the recommended “feeders” for use which may pose potential threats with the Louisiana black bear. Recently, the Louisiana black bear was delisted from the Federal List of Endangered and Threatened Wildlife.

As a result, the commissioner of the LDAF, Dr. Mike Strain, has elected to exercise his authority to cancel the state registration at this time for the Kaput Feral Hog Bait (EPA Reg. No. 72500-26) in Louisiana. Due to the cancellation of the state registration of the section 3 label in Louisiana, the section 24(c) (SLN No. LA17-0006) registration will no longer be needed, so the LDAF is requiring a cancellation of the Section 24(c) registration (SLN No. LA17-0006) at this time as well.



LOUISIANA DEPARTMENT OF AGRICULTURE & FORESTRY  
MIKE STRAIN DVM  
COMMISSIONER



The fees for the state section 3 and section 24(c) registrations will be returned to Scimetrics Ltd. Corp.

If you have any questions or need additional information concerning this registration cancellation, please contact me.

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Sincerely,

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